

**MEMO ENDORSED**

LAW OFFICES

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February 11, 2021

The request is denied. The defendant must surrender as directed by 10 a.m. on 2/26/21.  
So Ordered: 02-18-2021

**BY ECF**

Honorable Denise L. Cote  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007

  
DENISE COTE  
United States District Judge

**Re: *United States v. Zalmund Zirkind, S9 19***

AGREED LETTER MOTION TO CONTINUE SURRENDER DATE FROM FEBRUARY 26, 2021, PURIM, A JEWISH HOLIDAY, TO MARCH 1, 2021 AND TO VERIFY TIME OF SURRENDER.

Dear Judge Cote:

On behalf of Mr. Zirkind, this application respectfully seeks an opportunity to surrender to commence serving his 84-month jail term on March 1, 2021, instead of February 26, 2021, the day which commences the observance of the Jewish holiday, Purim and to confirm the time of surrender is 2 PM as per the *ore tenus* of January 15, 2021 and the JNC filed on January 15, 2021 as DE 191. Purim is the celebration of deliverance of the Jewish people from their intended annihilation. The holiday is observed the evening of February 26-27, which also commences the Sabbath. The Defendant respectfully requests his surrender be moved two days later in light of his observance of Purim. The Defendant recognizes that he will serve his term during many more holidays but respectfully seeks the opportunity to commence serving his jail term on another day.

In conflict with this Court's oral and written order, the Defendant received a letter from Christina Ramos, Administrative Assistant at the U.S. Probation Office, on February 4, 2021, stating the surrender time is 10 AM. Through this application, Mr. Zirkind also seeks to confirm the Court ordered 2 PM surrender. Counsel has reviewed this request with the assigned prosecutors who agree with the relief requested. We thank Your Honor for your review.

Respectfully submitted,

*/s Neil M. Schuster*  
Neil M. Schuster

NMS:asnd

By ECF:

Josh Rothman, PTS, Intensive Supervision Specialist

Stephanie Lake, AUSA

Aline R Flodr, AUSA

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